

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In Re:

Chapter 13

Kip Seremjian

Case No. 21-21695

Debtor

MOTION TO EXTEND AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(c)(3)

Debtor, Kip Seremjian, by his attorney, Anthony J Kryshak II, hereby move the Court for an order to extend the automatic stay as to all creditors pursuant to 11 U.S.C. §362(c)(3).

In support of this Motion, the Debtor respectfully shows the Court as follows:

1. Debtor has had one (1) previous case under Title 11, a Chapter 13 bankruptcy, dismissed within one (1) year of filing this present Chapter 13 bankruptcy. That case, 20-20008, was dismissed by Affidavit of Default filed with the court on November 12, 2020. An Order Dismissing Case was entered from the Court on November 20, 2020.

2. Debtor's previous bankruptcy was filed on January 2, 2020 and was done in good faith.

3. Debtor's only source of income at the time of filing the original plan was from his independent contractor work through Titan Incorporated. Due to the COVID-19 pandemic, Titan Incorporated temporarily closed its doors and ceased operation in March 2020. When Titan Incorporated resumed operations, it was only on a limited basis and Debtor did not return to his position as an independent contractor.

4. Debtor did receive unemployment after losing his position at Titan Incorporated, but eventually the Debtor was unable to keep up with his plan payments and other necessary living expenses due to the large drop in income.

5. In March 2021, Debtor was able to secure employment with StoreCom and Debtor with a base annual salary of \$137,500.00.

6. Unlike Debtor's previous case in which he lost his income due to the COVID-19 pandemic, Debtor now has sufficient income to provide for a feasible plan, as well as provide for Debtor's ongoing mortgage payment and necessary monthly living expenses.

7. Debtor believes he can re-file an effective plan for reorganization, which should result in a confirmed plan, and which the Debtor can now fully perform.

WHEREFORE, the Debtor, pursuant to 11 U.S.C. §362(c)(3), prays for an Order from the Court granting a continued automatic stay as to all of their creditors.

DATED this Wednesday, April 7, 2021.

By: /s/ Anthony J. Kryshak
Anthony J. Kryshak
Attorney for the Debtor
Bar #: 1063950

Anthony J. Kryshak
Kryshak Law Office, LLC
6127 Green Bay Rd. Ste. 101
Kenosha, WI 53142
Phone: (262) 764-2022
Fax: (262) 764-2043
Email: anthony@kryshaklawoffice.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re:

Kip Seremjian

Case No.:

21-21695

Chapter:

Chapter 13

NOTICE OF MOTION TO EXTEND AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(c)(3) AND NOTICE
OF HEARING

PLEASE TAKE NOTICE that the above-referenced Debtor, Kip Seremjian, by his attorney, Anthony J. Kryshak II, has filed a Motion with the Court to continue the automatic stay pursuant to 11 U.S.C. §362(c)(3).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Motion, or if you want the Court to consider your views on the Motion, then on or before **April 26, 2021**, you or your attorney must file a written objection with: **Clerk, U.S. Bankruptcy Court, U.S. Courthouse, Room 126, 517 E. Wisconsin Avenue, Milwaukee, WI 53202.**

You must also mail a copy to:

Attorney Anthony J. Kryshak II
6127 Green Bay Rd Ste 101
Kenosha, WI 53142

Trustee Scott Lieske
PO Box 510920
Milwaukee, WI 53203

If you mail your request to the Court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

A hearing **will only be held** on Tuesday, April 27, 2021 at 11:30 AM, by telephone (see attached instructions) before the Honorable Judge Perhach, at the U.S. Bankruptcy Court located at 517 E. Wisconsin Avenue, Milwaukee, WI **if an objection is filed on or before April 26, 2021.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting relief.

Dated April 7, 2021 at Kenosha, Wisconsin

By: /s/ Anthony J. Kryshak
Anthony J. Kryshak
Attorney for the Debtor
Bar #: 1063950

Anthony J. Kryshak
Kryshak Law Office, LLC
6127 Green Bay Rd. Ste. 101
Kenosha, WI 53142
Phone: (262) 764-2022
Fax: (262) 764-2043
Email: anthony@kryshaklawoffice.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In Re:

Chapter 13

Kip Seremjian

Case No. 21-21695

Debtor(s)

NOTICE OF TELEPHONE HEARING

PLEASE TAKE NOTICE that a telephone hearing will be held, if an objection to the Debtor's Motion to Extend Automatic Stay is filed on or before April 26, 2021 as specified in the attached Notice, before the Honorable Katherine M. Perhach, United States Bankruptcy Judge, **on April 27, 2021 at 11:30 a.m.**, to consider the Debtor's motion. To appear by telephone, you must call the court conference line at 1-888-675-2535, and enter access code 9918878 before the scheduled hearing time. The court may already be in session, so please wait quietly on the telephone for your case to be called. The debtor is welcome, but not required to participate in this hearing.

/s/ Anthony J. Kryshak II
Anthony J. Kryshak II
Attorney for the Debtor
Bar #: 1063950

Anthony J. Kryshak
Kryshak Law Office, LLC
6127 Green Bay Rd. Ste. 101
Kenosha, WI 53142
Phone: (262) 764-2022
Fax: (262) 764-2043
Email: anthony@kryshaklawoffice.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

**Case No.: 21-21695
Chapter: Chapter 13**

**In Re:
Kip Seremjian**

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service, Motion to Continue Stay and Notice of Motion and Hearing were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Kenosha, WI on Wednesday, April 7, 2021:

Kip Seremjian
3623 17th St
Kenosha, WI 53144

See attached sheet

Additionally, the documents referenced above were also served via electronic means on the following individuals on Wednesday, April 7, 2021:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Trustee Scott Lieske
Chapter 13 Trustee
PO Box 510920
Milwaukee, WI 53203

DATED this Wednesday, April 7, 2021.

By: /s/ Anthony J. Kryshak
Anthony J. Kryshak
Attorney for the Debtor

Anthony J. Kryshak
Kryshak Law Office, LLC
6127 Green Bay Rd. Ste. 101
Kenosha, WI 53142
Phone: (262) 764-2022
Fax: (262) 764-2043
Email: anthony@kryshaklawoffice.com

Label Matrix for local noticing
0757-2
Case 21-21695-kmp
Eastern District of Wisconsin
Milwaukee
Wed Apr 7 14:51:36 CDT 2021

(p)ALLIANCE COLLECTION AGENCIES INC
ATTN CLIENT SERVICES DEPARTMENT
3916 S BUSINESS PARK AVE
MARSHFIELD WI 54449-9029

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Commonwealth Finance
Attn Bankruptcy Dept
245 Main St
Scranton, PA 18519-1641

Directv, LLC
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

Diversified Consultants
Attn Bankruptcy Dept
PO Box 551268
Jacksonville Beach, FL 32250

Federal National Mortgage Association
Attn Bankruptcy Dept
14221 Dallas Pkwy Ste 1000
Dallas, TX 75254-2946

Froedtert South
Attn Bankruptcy Dept
6308 8th Ave
Kenosha, WI 53143-5031

Midwest Medical Technologies of America
c/o Sorrentino Burkert Risch LLC
Attn Bankruptcy Dept
675 N Barker Rd Ste 300
Brookfield, WI 53045-5911

ODess and Associates
Attn Bankruptcy Dept
1414 Underwood Ave #403
Milwaukee, WI 53213-2653

Office of the U. S. Trustee
517 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

Oliver Adjustment Company
Attn Bankruptcy Dept
3416 Roosevelt Rd
Kenosha, WI 53142-3937

Southeastern Wisconsin Anesthesiology SC
Attn Bankruptcy Dept
225 S Executive Dr
Brookfield, WI 53005-4257

Sundance Inc
Attn Bankruptcy Dept
9508 Michigan Ave Ste C
Sturtevant, WI 53177-2427

US Bank Trust NA
c/o Caliber Home Loans Inc
Attn Bankruptcy Dept
13801 Wireless Way
Oklahoma City, OK 73134-2500

Anthony J. Kryshak
Kryshak Law Office, LLC
6127 Green Bay Rd. Ste. 101
Kenosha, WI 53142-2929

Katherine M Seremjian
3623 17th St
Kenosha, WI 53144-3341

Kip Seremjian
3623 17th St
Kenosha, WI 53144-3341

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203-0161

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Alliance Collection Agencies
Attn Bankruptcy Dept
3916 S Business Park Ave
Marshfield, WI 54449

Americollect
Attn Bankruptcy Dept
1851 S Alverno Rd
Manitowoc, WI 54220

End of Label Matrix	
Mailable recipients	18
Bypassed recipients	0
Total	18